

## REMARKS

Claims 1-54 are pending after this amendment.

The amendments and remarks presented herein are in response to the Office Action dated February 7, 2005. Applicant has amended claims 11, 16, 31, 35, 47, and 51 in order to more particularly define the invention. The amendments were not necessitated by the claim rejections. Applicant makes no admission as to the patentability or unpatentability of the originally filed claims.

The Examiner rejected claims 11, 16, 31, 35, 47, and 51 under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. These claims have been amended to clarify the nature of the modified first input parameter.

The Examiner rejected claims 1-10, 13-15, 18-30, 33-34, 37, 45, 49-50, and 53-54 under 35 U.S.C. 102(a) as being anticipated by CheckFree's Recon-Plus for Windows. This rejection is respectfully traversed.

Claim 1 recites:

"A computer-implemented method for reconciling a first transaction in a first list with a combination of at least two transactions in a second list, each transaction having a value, the method comprising:

obtaining the first transaction;  
obtaining the second list of transactions;  
determining whether the value of the first transaction corresponds to a combination of the values of a subset of transactions in the second list; and

responsive to the value corresponding to the combination of values, indicating a match between the first transaction and the subset of transactions.”

The claimed method recites a specific method for reconciling a first transaction in a first list with a combination of at least two transactions in a second list.

Claim 14 recites:

“A computer-implemented method for reconciling a first combination of at least two transactions in a first list with a second combination of at least two transactions in a second list, each transaction having a value, the method comprising:  
obtaining each transaction in the first combination;  
combining the obtained transactions to generate a first value;  
obtaining the second list of transactions;  
determining whether the first value corresponds to a combination of the values of a subset of transactions in the second list; and  
responsive to the first value corresponding to the combination of values, indicating a match between the first combination and the subset of transactions.”

The claimed method recites a specific method for reconciling a first combination of at least two transactions in a first list with a second combination of at least two transactions in a second list.

Claim 15 recites:

“A computer-implemented method for matching a first value with a combination of at least two values in a list of values, the method comprising:  
obtaining the first value;  
obtaining the second list of values;  
performing a submethod, using a first input parameter including the first value and a second input parameter including the second list of values, to determine whether the first value corresponds to a combination of values from the second list; and  
responsive to the first value corresponding to the combination of values, indicating a match for the first value.”

The claimed method recites a specific method for matching a first value with a combination of at least two values in a list of values.

The Examiner relies on pages from an archived website which apparently dates back to February 29, 2000 and contains a description of Recon-Plus for Windows. However, the description provided in the cited pages is merely a marketing description that sets forth, in general terms, the need for better reconciliation systems, as well as the overall goals and advantages of the Recon-Plus software over manual reconciliation. There is no hint or suggestion of specific steps, methodology, or architecture for performing the functionality to achieve those goals. In particular, there is no hint or suggestion of a system or method for reconciling a first transaction in a first list with a combination of at least two transactions in a second list, as claimed herein. Furthermore, the cited pages fail to teach the specific steps recited in the claimed invention.

For example, Recon-Plus states that “the data consistency necessary for quick, accurate matching is often lacking – especially when single transactions must be matched with multiple transactions”, but fails to describe any specific methodology for reconciling combinations of transactions as claimed herein. In fact, the above-quoted text merely sets forth a need for accurate matching but does not state that Recon-Plus even performs such matching, nor does it provide any description of how such functionality would be implemented. Furthermore, this section of Recon-Plus contains no mention of matching a first combination of transactions with a second combination of transactions.

Applicant can find only one mention of many-to-many reconciliation in the Recon-Plus document (in the “Matching Made Easy” section, at the line identified by Case 16319-04760

the Examiner as line 86), but this merely states a desired outcome: "Aggregate - Items are matched one-to-many or many-to-many". Again, there is no description of how such a function is implemented, or of the architecture or methodology for doing so. Most of the remaining Recon-Plus description is merely marketing puffery that does not provide any specific description of a system or method that contains the limitations recited in the claims herein.

Furthermore, there is no description anywhere in Recon-Plus of a submethod for determining whether a first value corresponds to a combination of values. Recon-Plus describes a "multiple-pass engine" for successively reducing the restrictiveness of the matching rules, but fails to describe any specific matching method that employs a submethod using a first input parameter including a first value and a second input parameter including a second list of values, to determine whether the first value corresponds to a combination of values from the second list, as claimed herein.

With respect to claim 14, the Examiner states that Recon-Plus' mention of "many-to-many" matching (line 86) represents reconciling a first combination of at least two transactions in a first list with a second combination of at least two transactions in a second list, and thereby anticipates claim 14 (as well as claims 20, 33, 39, 49, and 54). However, claim 14 recites specific steps and elements for performing the reconciliation, many of which are not disclosed by Recon-Plus. For example, claim 14 recites such specific steps as "combining the obtained transactions to generate first value", "determining whether the first value corresponds to a

combination of the values of a subset of transactions in the second list”, and “responsive to the first value corresponding to the combination of values, indicating a match between the first combination and the subset of transactions.” None of these specific steps and limitations is taught by Recon-Plus. In fact, Recon-Plus discloses little more than the desired goal of performing many-to-many item matching, without any indication of how such a goal is accomplished or what steps are performed by the Recon-Plus system.

Claims 20, 21, 33, and 34 are computer program product claims that recite similar limitations to those discussed above with respect to the method claims. Claims 45, 49, 50, and 54 are system claims that that recite similar limitations to those discussed above with respect to the method claims. Accordingly, for the reasons stated above, Applicant respectfully submits that claims 1, 14, 15, 20, 21, 33, 34, 45, 49, 50, and 54 are patentably distinct from Recon-Plus.

Claims 2-10 and 13 are dependent claims that incorporate all of the limitations of claim 1. Claims 18-19 are dependent claims that incorporate all of the limitations of claim 15. Claims 22-30 are dependent claims that incorporate all of the limitations of claim 21. Claim 37 is a dependent claim that incorporates all of the limitations of claim 34. Claim 53 is a dependent claim that incorporates all of the limitations of claim 50. The dependent claims also recite additional features and limitations that are not taught or suggested by Recon-Plus. Therefore, for at least the reasons stated above, Applicant respectfully submits that these dependent claims are patentably distinct from Recon-Plus.

With respect to claims 10, 13, and 30, the Examiner states that, by mentioning a “multiple pass engine” at lines 79-82, Recon-Plus teaches a recursive submethod that anticipates limitations of claims 10, 13, and 30. However, the word “recursive” never appears anywhere in the cited reference. Recon-Plus merely discloses matching items on a given set of criteria, and then expanding the matching rules based upon less restrictive criteria. This refers to performing one-to-one matching (first set of criteria), followed by aggregate matching (less restrictive criteria), as clarified by the example that immediately follows the mention of “multiple pass engine”. No recursive method or submethod is described. In fact, Recon-Plus completely fails to disclose a key concept of recursion, namely the ability of a recursive method to call itself. Merely performing a task more than once (repetition, or multiple passes) is not equivalent to recursion.

In addition, there is no hint or suggestion of any recursive submethod for determining whether a value of a first transaction corresponds to a combination of values of a subset of transactions in a second list, as recited in claims 10 and 30. Rather, the “multiple pass” approach of Recon-Plus merely contemplates two passes: one-to-one matching followed by aggregate matching.

With respect to claims 3, 19, 23, 38 and 42, the Examiner states that Recon-Plus’ multiple pass engine can be used to reconcile transactions as one-to-one or aggregate (lines 84-86). The Examiner further asserts that this teaching anticipates limitations of claims 3, 19, 23, 38 and 42 because it represents determining whether

the value of the first transaction corresponds to a sum of the values of a subset of transactions in the second list.

However, the cited reference merely describes the one-to-one and aggregate matching techniques as examples of the two passes themselves. Specifically, Recon-Plus describes matching on a given set of criteria (one-to-one matching), then expanding matching rules based on less restrictive criteria (aggregate matching). There is no hint or suggestion of any multiple pass technique (whether recursive or not) that operates in the context of an aggregate or one-to-many or many-to-many matching method.

Furthermore, Examiner has not provided an explanation of how Recon-Plus' mention of a multiple pass engine can be said to teach "determining whether the value of the first transaction corresponds to a sum of the values of a subset of transactions in the second list". There is no hint or suggestion in Recon-Plus of any technique for obtaining a sum of values of a subset of transactions, nor is there any hint or suggestion of determining whether a value corresponds to such a sum. In fact, nowhere in Recon-Plus is there any mention of adding values of transactions or of generating a sum of values of transactions.

With respect to claims 7, 27, 44, 8, 28, and 25, the Examiner states that Recon-Plus' teaching that "match groups can be created using any field in the system" and that "any data populated on the items can be viewed during the matching session" (lines 95-96) represents the ability to match over a specific date or over a range of dates and thereby anticipates claims 7, 27, 44, 8, 28, and 25. By contrast, the cited

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portion of Recon-Plus merely teaches that matches can be based on any field; presumably such fields record various types of data that describe or are related to an item being matched. There is no mention of matching over a specific date or over a range of dates. Furthermore, the date matching of the present invention is performed in the context of a specific method that is not taught in Recon-Plus. In particular, there is no teaching or suggestion in Recon-Plus of obtaining a second list of transactions having dates identical to a date of a first transaction (or having dates within a specified time period of the date of the first transaction), and then determining whether the value of the first transaction, as claimed herein. Recon-Plus' teaching that data can be viewed while matching is being performed is not relevant to the claimed invention.

With respect to claims 9 and 29, the Examiner states that Recon-Plus' teaching that "items are first matched on a given set of criteria, then matching rules can be further expanded based upon less restrictive criteria" (lines 81-82) represent modifying a specified time period and repeating the steps of obtaining the second list, determining whether the value of the first transaction corresponds to a combination of values of a subset of transaction [sic] in the second list, and, responsive to the value corresponding to the combination of values, indication [sic] a match between the first transaction and the subset of transaction [sic]. Accordingly, the Examiner states that this teaching of Recon-Plus anticipates claims 9 and 29.

As discussed above, Recon-Plus' disclosure at lines 81-82 merely describes matching items on a given set of criteria, and then expanding the matching rules

based upon less restrictive criteria. This refers to performing one-to-one matching (first set of criteria), followed by aggregate matching (less restrictive criteria), as clarified by the example that immediately follows the mention of "multiple pass engine". There is no hint or suggestion of modifying a specified time period and repeating matching steps. Furthermore, there is no hint or suggestion of applying such a technique in the context of determining and indicating a match between a first transaction and a subset of transactions.

The Examiner rejected claims 11, 12, 16, 17, 31, 32, 35, 36, 46, 47, 48, 51, and 52 under 35 U.S.C. 103 as being unpatentable over CheckFree's Recon-Plus for Windows. This rejection is respectfully traversed.

Claims 11, 12, 16, 17, 31, 32, 35, 36, 46, 47, 48, 51, and 52 all variously depend from claims discussed above in connection with the 102(a) rejection, and are therefore distinguishable from the cited art for the reasons stated above. These claims further recite additional limitations specifying elements of a recursive submethod for performing reconciliation operations. For example, claim 11, which has been amended merely to more accurately set forth the claimed invention, recites:

"The method of claim 10, wherein performing the recursive submethod comprises:  
responsive to one of the values of a transaction in the second input parameter equaling the first input parameter, returning a transaction list including the transaction having the equal value;  
responsive to none of the values of transactions in the second input parameter equaling the first input parameter, and the second parameter containing only one transaction, returning an indicator that no match was found;  
responsive to none of the values of transactions in the second input parameter equaling the first input parameter, and the second parameter containing more than one transaction,

performing the recursive submethod using a modified first input parameter and a modified second input parameter, the modified second input parameter omitting a selected transaction and the modified first input parameter being obtained by subtracting the value of the selected transaction from the first input parameter."

Claim 12 recites:

"The method of claim 10, wherein performing the recursive submethod comprises:  
responsive to one of the values of a transaction in the second input parameter equaling the first input parameter, returning a transaction list including the transaction having the equal value;  
responsive to none of the values of transactions in the second input parameter equaling the first input parameter, and the second parameter containing only one transaction, returning an indicator that no match was found;  
responsive to none of the values of transactions in the second input parameter equaling the first input parameter, and the second parameter containing more than one transaction, performing the steps of:  
a) selecting a transaction in the second input parameter;  
b) subtracting the value of the selected transaction from the first input parameter to obtain a modified first input parameter;  
c) generating a modified set of transactions including all transactions in the second input parameter except the selected transaction;  
d) performing the recursive submethod using a first input parameter including the modified first input parameter and a second input parameter including the modified set of transactions;  
e) responsive to the recursive submethod returning a transaction list, adding the selected transaction to the returned list to generate a modified transaction list, and returning the modified transaction list;  
f) responsive to the recursive submethod returning an indicator that no match was found, performing the steps of:  
responsive to any transactions remaining in the second input parameter, repeating steps a) through f); and  
responsive to no transactions remaining in the second input parameter, returning an indicator that no match was found."

These claims recite specific steps of the recursive method, and further recite conditions and mechanisms for the recursive method to call itself. Other claims recite similar limitations.

The Examiner correctly states that Recon-Plus fails to detail the exact steps used by the multiple pass engine. The Examiner has not provided any reference that

anticipates or renders obvious the claimed limitations. Rather, the Examiner asserts that one of ordinary skill in the art would recognize that the basis for all one-to-many reconciliation methods is rooted in the idea that the sum of the parts is equal to the whole, and that the Recon-Plus method therefore need not teach the specific steps used by the multiple pass engine to render the invention obvious.

Applicant respectfully points out that the notion that a sum of parts is equal to a whole is merely a basic mathematical premise that does not, by itself, yield or suggest a methodological process for performing one-to-many reconciliation. Furthermore, the Examiner has not provided any basis, authority, or citation for the assertion that the basis for all one-to-many reconciliation methods is the idea that the sum of the parts is equal to the whole.

Furthermore, even if one is to assume that the Examiner's assertion is correct, it does not follow that the particular method steps and elements claimed herein are made obvious by the disclosure of Recon-Plus. Claims 11, 12, 16, 17, 31, 32, 35, 36, 46, 47, 48, 51, and 52 specifically recite recursive methods, and further recite particular steps for implementing and performing these recursive methods (including conditions for a submethod to call itself). There are any number of methods that can be used for performing one-to-many reconciliation, including some that may involve recursive methodologies and some that may not. As discussed above, Recon-Plus fails to even mention recursion or recursive methods; it merely describes a "multiple pass engine" which can check for match on a first criteria (e.g. one-to-one) and then expand the match rules based on a less restrictive

criteria (e.g. aggregate). In addition, as mentioned above, Recon-Plus fails to disclose a key concept of recursion, namely the ability of a recursive method to call itself. Therefore it cannot be said that Recon-Plus anticipates or make obvious the particular recursive methodology recited in the claims.

Accordingly, for at least the reasons stated, Applicant hereby submits that claims 11, 12, 16, 17, 31, 32, 35, 36, 46, 47, 48, 51, and 52 are patentable over Recon-Plus.

Applicant notes that no rejection is set forth for claims 38-44, although these claims are listed as rejected in the Office Action summary. Applicant respectfully requests that the Examiner clarify whether these claims are allowable or rejected. If the claims are rejected, Applicant respectfully requests that the Examiner issue a nonfinal office action setting forth the grounds for rejection, so as to provide Applicant with an opportunity to respond to the rejection before a final office action is issued.

Applicant notes that with respect to claims 1, 15, 21, 34, and 50, the Examiner has not provided any explanation as to how the cited art applies to these claims. Accordingly, Applicant respectfully requests that the Examiner clarify the grounds for rejecting these claims, or alternatively withdraw the rejection. If the claims are rejected, Applicant respectfully requests that the Examiner issue a nonfinal office

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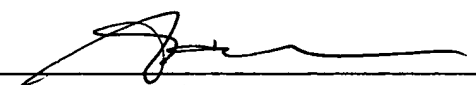
action, so as to provide Applicant with an opportunity to respond to the rejection before a final office action is issued.

On the basis of the above amendments, consideration of this application and the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above amendments and remarks, or if the Examiner believes that for any reason direct contact with Applicant's representative would help to advance the prosecution of this case to finality, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,  
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